

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA (HARRISBURG)

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In re:

Bky. Case No. 1:22-bk-01135-HWV

Phillip I. White, III,

Chapter 13 Case

Debtor.

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**OBJECTION OF EMVLP II, LLC D/B/A STATE FARM BANK TO  
CONFIRMATION OF DEBTOR'S AMENDED CHAPTER 13 PLAN**

COMES NOW, Creditor EMVLP II, LLC d/b/a State Farm Bank ("SFB"), by and through counsel, respectfully objects to the Debtor's proposed Amended Chapter 13 Plan ("Amended Plan") filed on September 9, 2022. In support of this objection, SFB states as follows:

1. The Amended Plan does not provide a reasonable collateral value to SFB for the Debtor's 2018 Hyundai Santa Fe.
2. The Debtor owes SFB \$19,548.58 in connection with his secured loan for the collateral.
3. The Amended Plan values the collateral at \$13,000.00 (see Doc. No. 22, p. 7.) while the industry-standard Mannheim Market Report dated August 3, 2022 (attached hereto as Exhibit A), lists the collateral's fair market value at \$20,600.
4. Given the estimated fair market value of the collateral, Debtor cannot "cram down" this provision of the Amended Plan, drastically undervaluing SFB's collateral.
5. SFB is adversely affected by the filed plan, and respectfully requests that Court deny confirmation of the Amended Plan, as filed.

Dated: October 4, 2022

/s/ Michael A. Hynum, Esquire  
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**Attorneys for EMVLP II, LLC d/b/a State  
Farm Bank**

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### CERTIFICATE OF SERVICE

Michael A. Hynum, retained by Moss & Barnett, with office address of 150 South Fifth Street, Suite 1200, Minneapolis, Minnesota 55402, declares under penalty of perjury that on October 4, 2022, in addition to the parties on file with the court's ECF system who currently receive service by electronic notice in this matter, I caused the following documents: **(1) Objection of EMVLP II, LLC d/b/a State Farm Bank to Confirmation of Debtor's Chapter 13 Plan; and (2) Certificate of Service** to be served on the parties listed on the attached Service List.

Executed: October 4, 2022

/s/ Michael A. Hynum, Esquire